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January 5, 2007

Honorable James H. Welsh
Commissioner of Conservation
Department of Natural Resources
Office of Conservation
P. O. Box 94275
Baton Rouge, Louisiana 70804-9275

RE: Proposed Substitute Unit Well
at Exceptional Location
Zone C, Reservoir A, SUW
VINTON FIELD
Calcasieu Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of Orion Oil & Gas, LLC, for the calling of a public hearing, after ten (10) days legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Zone C, Reservoir A, SUW, in the Vinton Field, Calcasieu Parish, Louisiana, for which a unit was established and rules and regulations adopted by Office of Conservation Order No. 100, effective July 9, 1945.

1. To grant an exception to the spacing provisions of Office of Conservation Order No. 100, so as to authorize and permit Orion Oil & Gas, LLC to designate their M. Gray G. No. 60 Well as a substitute unit well at an exceptional location for the C RA SUW, which is located more than 100' from the center of the unit as shown on the plat which is attached hereto and made a part hereof.

2. To designate Orion Oil & Gas, LLC as the unit operator.

3. Except as may be in conflict with the provisions hereof, the provisions of the Office of Conservation Order No. 100 shall remain in full force and effect.

4. To consider such other matters as may be pertinent to this application.

The Orion Oil & Gas, LLC - M. Gray G. No. 56-D, the present unit well, ceased to produce from the Zone C in September, 1975. The proposed substitute unit well will allow the recovery of hydrocarbons within the existing unit which would otherwise be lost.

The Zone C, Reservoir A, in the Vinton Field, Calcasieu Parish, Louisiana, was fully defined in Office of Conservation Order No. 100, effective July 9, 1945.

There is attached hereto and made a part hereof a plat outlining the subject unit created by Conservation Order No. 100, along with the location of the proposed substitute unit well. Pursuant to the Revised Rules of Procedure, a list of names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom this application is being sent is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list will be provided to any party requesting a copy. A diligent effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties as required by the Revised Rules of Procedure.

Finally, there is enclosed our check on behalf of the applicant, Orion Oil & Gas, LLC, in the sum of \$755.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

LEON E. COMEAUX & ASSOCIATES



Bill McAlister

BM/cu

Enclosures

cc: Mr. Richard Hudson
Office of Conservation
825 Kaliste Saloom Road
Brandywine III, Suite 220
Lafayette, Louisiana 70508-4284

Interested Parties, Interested
Owners and Represented Parties

SUK

R 12 W

69
5730'

SUL

5
6143'
44
5075'
38
5400'76
5920'78
5913'

SUM

6
5837'
45
5127'

SUV

SUW

Present
Unit Well56
6225'
85
6250'C RA SUW
± 10 ACRES
APO 10032
5828'
4
6028'
48
5840'60
5087'Proposed
Substitute
Unit Well84
5713'

Matilda G. Gray, et al

SUX

5
6270'
58
5724'7
5830'33
5102'72
5813'
59
5800'
67
5260'T
10
SN
YK
K3-X
5649'

SUHH

75
5411'

SUII

(ST)
5275'
22
(OH)
5316'
67
5157'
82
79
4994'

SECTION 33

SUJJ

3
5360'77
5102'81
4845'2
4560'1
4508'BB-4
4545'

4175' B-3

EXHIBIT NO.

DOCKET NO.

ORION OIL & GAS, LLC

VINTON FIELD
CALCASIEU PARISH, LOUISIANAPROPOSED SUBSTITUTE UNIT WELL
ZONE C

Geology by: William S. McAister, Jr.

0 200' 400'

DATE:

LEON E. COMEAUX & ASSOC.

GEOLOGISTS